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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

**CLASS ACTION**

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**

Judge: Hon. Richard Seeborg

Pursuant to Civil Local Rules 7-11 and 79-5(e), named plaintiffs Artiom Frunze and Pumaro LLC (collectively, “Plaintiffs”) hereby submit this administrative motion (“Administrative Motion”) for an order permitting Plaintiffs to file under seal the following materials filed in connection with Plaintiffs’ Motion for Class Certification: (1) Plaintiffs’ Memorandum of Law in Support of their Motion for Class Certification (the “Motion”); and (2) Exhibits J, M, O, R, and W to the Declaration of Hung G. Ta in Support of Plaintiffs’ Motion for Class Certification (collectively, the “Exhibits”).

The basis of the Administrative Motion is that the Exhibits consist of documents designated “Confidential” by Defendant Dynamic Ledger Solutions, Inc. pursuant to the Stipulated Protective Order, so ordered by this Court on October 22, 2018 (Dkt. No. 178), and the Motion discusses those designated materials in support thereof.

Local Rule 79-5(e) provides: “If the Submitting Party [*i.e.*, a party seeking to file a document, or portions thereof, under seal] is seeking to file under seal a document designated as confidential by the opposing party or a non-party pursuant to a protective order, or a document containing information so designated by an opposing party or a non-party, the Submitting Party’s declaration in support of the Administrative Motion to File Under Seal must identify the document or portions thereof which contain the designated confidential material and identify the party that has designated the material as confidential (‘the Designating Party’).” Plaintiffs identify in the accompanying declaration the materials at issue that have been designated as “Confidential” in this action. However, this Administrative Motion should not be construed as Plaintiffs’ agreement that the documents marked “Confidential” are confidential or that such documents should be filed under seal.

Date: January 9, 2019

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By: s/ Enoch H. Liang

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